

November 17, 2022

via EM/CF

Jones
Law Firm P.C.

The Honorable Jennifer L. Rochon
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Courtroom 20B
New York, NY 10007

**Re: Client's Health Status in SDNY Case No. 21-cv-01803,
*Coker v. Goldberg & Associates P.C.***

Dear Judge Rochon:

I am writing to update the Court of the health status of our client, Defendant Julie Goldberg. As the Court is aware, in a letter dated on November 11, 2022, this office alerted the Court of our client's health issue and stated our intention of asking for a sixty-day stay of the proceedings while our client underwent treatment. This Court requested more information regarding these health issues; I would like to provide that here.

Attached to this correspondence is a letter from our client's treating physician. It is clear in his medical opinion that our client needs the medical leave to treat the health issue that she is undergoing.

Although our office had been aware that our client had an ongoing health issue, we did not alert the Court or opposing counsel both out of respect for her privacy, and because, up to that point, none of her health issues had affected litigation. We had been able to continuously represent her without interruption in this court case. Unfortunately, that changed this past Friday, November 11, 2022.

Despite learning that she would soon have to undergo more intensive treatment, our client was prepared to proceed with her deposition as long as it could be completed before November 29, 2022, when her treatment begins. Several dates were shared with opposing counsel (afternoon of 11/17, all day 11/18, afternoon of 11/22, all day 11/25, and afternoon of 11/28) so as to getting the deposition done prior to her medical treatment, but those dates did not work for opposing counsel.

As of this writing, this office is unsure if any of those dates would still work for our client's deposition.

Our client is going through a serious medical condition. The timing is unfortunate, but hopefully, the effects on her and this court case will not be lasting. It is our intention, if this Court grants our stay request, to proceed with this case as expeditiously as possible once our client is physically able to do so.

Thank you for your attention to this matter.

Respectfully,

/s/ Bryce Jones

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